

MAR 12 2024

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS  
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**DANIEL WASHBURN,**

Defendant.

CRIMINAL NO. *24-308 DNU*

18 U.S.C. §§ 1153, 2243(a), and  
2246(2)(A): Sexual Abuse of a Minor.

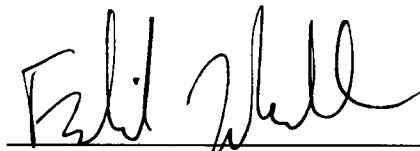
INDICTMENT

The Grand Jury charges:

Between on or about February 1, 2019 and on or about February 28, 2019, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **DANIEL WASHBURN**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe, a child who attained the age of 12 years, but had not attained the age of 16 years, and Jane Doe is at least four years younger than the Defendant, and the sexual act consisted of contact between the penis of the Defendant and the vulva of Jane Doe, involving penetration, however slight, of Jane Doe's vulva.

In violation of 18 U.S.C. §§ 1153, 2243(a) and 2246(2)(A).

A TRUE BILL:

  
Assistant United States Attorney

151  
FOREPERSON OF THE GRAND JURY